

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE:

Patricia L. Drake

Case No. 18-10097  
Judge Pamela S. Hollis  
Chapter 13

Debtor,  
\_\_\_\_\_ /

**AGREED DEFAULT ORDER AS TO RUSHMORE LOAN MANAGEMENT  
SERVICES, LLC AS SERVICER FOR WILMINGTON SAVINGS FUND SOCIETY,  
FSB, D/B/A CHRISTIANA TRUST, NOT INDIVIDUALLY BUT AS TRUSTEE FOR  
PRETIUM MORTGAGE ACQUISITION TRUST**

This matter came to be considered on the Motion to Impose the Stay, all parties having notice, the Court having jurisdiction and being fully advised:

**IT IS HEREBY ORDERED** the Debtor is to make regular monthly payments.

Failure to make regular payments shall constitute a default.

**IT IS FURTHER ORDERED** that if the Debtor fails to timely pay two or more regular monthly payments, counsel for Rushmore Loan Management Services as servicer for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition Trust file an Affidavit of Default with the court and mail a copy to the Debtor and counsel for Debtor. The Debtor shall have fourteen (14) days from the date of the filing of Affidavit to cure the default. If the Debtor fails to cure said default, while maintaining all subsequently required payments, within fourteen (14) days, counsel for Rushmore Loan Management Services as servicer for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition Trust shall file a Default Order Terminating the Automatic Stay with the Court and the automatic stay imposed shall be terminated with respect to the real

property located at 406 Cobblestone Court, Oswego, Illinois, 60543, without further notice or hearing.

**IT IS FURTHER ORDERED** the Debtor shall be limited to one (1) default with a right to cure under this Order. If the Debtor defaults under the terms of this Order once, the Debtor shall have no right to cure, and the automatic stay shall be terminated upon the filing of an Affidavit of Default and a Default Order Terminating the Automatic Stay.


**IT IS FURTHER ORDERED** that upon the entry of any Order Terminating the Automatic Stay, The provisions of Fed.R.Bankr.P.3002.1 shall be waived with respect to Movant and the property located at 406 Cobblestone Court, Oswego, Illinois, 60543.

**IT IS FURTHER ORDERED** that Rushmore Loan Management Services as servicer for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition Trust shall be allowed to file a Notice of Post petition fees and costs to include Attorney fees and/or costs incurred for bringing this Objection before the Court.

/s/ Ashley K. Rasmussen  
Potestivo & Associates, P.C.  
Ashley K. Rasmussen(ARDC#6308095)  
Attorney for Rushmore Loan Management  
Services, LLC  
223 W. Jackson Blvd, Suite 610  
Chicago, IL 60606  
(312) 263-0003  
[arasmussen@potestivolaw.com](mailto:arasmussen@potestivolaw.com)  
Cook County Firm ID #: 43932  
DuPage County ID #: 223623  
Our File 108692

/s/ John J. Lynch  
John J. Lynch  
Attorney for Debtor  
1011 Warrenville Road, Suite 150  
Lisle, IL 60532  
(630)960-4700  
[jlynch@lynch4law.com](mailto:jlynch@lynch4law.com)

DATE: MAY - 4 2018

  
HONORABLE PAMELA S. HOLLIS  
UNITED STATES BANKRUPTCY JUDGE